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 [CAPTION PAGE CONTINUED ON NEXT PAGE]

Attorneys for Defendants OPENAI, INC., a Delaware nonprofit corporation, OPENAI, L.P., a Delaware limited partnership, OPENAI GP, L.L.C., a Delaware limited liability company, OPENAI STARTUP FUND GP I, L.L.C., a Delaware limited liability company, OPENAI STARTUP FUND I, L.P., a Delaware limited partnership, OPENAI STARTUP FUND MANAGEMENT, LLC, a Delaware limited liability company

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

J. DOE 1 and J. DOE 2, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

GITHUB, INC., a Delaware corporation; MICROSOFT CORPORATION, a Washington corporation; OPENAI, INC., a Delaware nonprofit corporation; OPENAI, L.P., a Delaware limited partnership; OPENAI GP, L.L.C., a Delaware limited liability company; OPENAI STARTUP FUND GP I, L.L.C., a Delaware limited liability company; OPENAI STARTUP FUND I, L.P., a Delaware limited partnership; OPENAI STARTUP FUND MANAGEMENT, LLC, a Delaware limited liability company,

Defendants.

Case No. 4:22-cv-06823-JST  
 4:22-cv-07074-JST

Hon. Jon S. Tigar

**JOINT STIPULATION AND  
 [PROPOSED] ORDER REGARDING  
 EXTENSION OF TIME**

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1 Pursuant to Civil Local Rule 6-2(a), Plaintiffs J. Doe 1-4 (“Plaintiffs”) and Defendants  
2 GitHub, Inc; Microsoft Corporation; OpenAI, Inc.; OpenAI, L.P.; OpenAI GP, L.L.C.; OpenAI  
3 Startup Fund GP I, L.L.C.; OpenAI Startup Fund I, L.P.; and OpenAI Startup Fund Management,  
4 LLC (“Defendants”) (collectively, the “Parties”), by and through their counsel of record, hereby  
5 jointly make the following stipulated request for a two-week extension of the current deadlines  
6 related to Plaintiffs’ Motion for Entry of Protective Order (ECF No. 49), as set forth below:

7 WHEREAS, on January 23, 2023, Plaintiffs filed their Motion for Entry of Protective  
8 Order for Litigation Involving Patents, Highly Sensitive Confidential Information and/or Trade  
9 Secrets (the “Motion”) (ECF No. 49);

10 WHEREAS, pursuant to Civil Local Rule 7-3, Defendants’ deadline to oppose Plaintiffs’  
11 Motion is February 6, 2023, and Plaintiffs’ deadline to reply is February 13, 2023;

12 WHEREAS, the Parties previously stipulated twice to an extension of the deadline for  
13 Defendants to move or otherwise respond to the Complaint as well as Plaintiffs’ response and  
14 Defendants’ replies to any such motion;

15 WHEREAS, the Parties conferred and agreed to an extension of the deadline for  
16 Defendants to respond to the Motion, and good cause exists for the extension to allow the Parties  
17 to negotiate a jointly stipulated protective order; and

18 WHEREAS, an extension of these deadlines related to Plaintiffs’ Motion for Entry of  
19 Protective Order will not alter the date of any other event or deadline already fixed by Court  
20 order.

21 NOW THEREFORE, the Parties STIPULATE AND AGREE, by and through their  
22 counsel, to extend the deadlines related to Plaintiffs’ Motion for Entry of Protective Order by two  
23 weeks to the following schedule:

- 24 • Defendants’ deadline to file an opposition will be February 20, 2023;
  - 25 • Plaintiffs’ deadline to file a reply will be February 27, 2023; and
  - 26 • Hearing on Plaintiffs’ Motion for Entry of Protective Order will be March 23, 2023.
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2 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**  
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4 Dated: \_\_\_\_\_  
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Honorable Jon S. Tigar  
United States District Judge  
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1 Dated: February 6, 2023

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3 By: /s/ Joseph C. Gratz  
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OPENAI GP, L.L.C., a Delaware limited  
17 liability company, OPENAI STARTUP  
FUND GP I, L.L.C., a Delaware limited  
18 liability company, OPENAI STARTUP  
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MANAGEMENT, LLC, a Delaware limited  
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1 Dated: February 6, 2023

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11 Microsoft Corporation

12 Dated: February 6, 2023

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24 Attorneys for Plaintiffs J. Does 1-4  
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**ECF ATTESTATION**

Pursuant to Local Rule 5-1(h)(3), I attest under penalty of perjury that concurrence in the filing of this document has been obtained from any other signatory to this document.

Dated: February 6, 2023

MORRISON & FOERSTER LLP

By: /s/ Joseph C. Gratz  
Joseph C. Gratz